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**NATIONAL  
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December 11, 2000

Federal Aviation Administration  
Office of the Chief Counsel,  
Attn: Rules Docket (AGC-200)  
Docket No. 28293, **FAA-2000-7952-50**  
Room 915G,  
800 Independence Avenue, SW  
Washington, DC 20591

Subject: Comments to Docket No.28293, 14 CFR Part 121 et al  
Service Difficulty Reports: Final Rule

The National Business Aviation Association (NBAA) represents the interests of over 6,000 companies that own or operate aircraft for business transportation. The purpose of this comment is to provide our perspective on current practices by both FAA, industry, and to recommend adoption of current industry practice as means of providing the improvement desired of this final rule.

Prior to this Service Difficulties Reporting final rule, current rules require reporting of difficulties by operators 14 CFR Part 121, 125, 135, and 145. Present practice by FAA is to monitor SDRs looking for trends, approaching manufacturers when levels arise high enough to be of concern. This current process does not allow for timely detection and dissemination of information to operators. Making this process somewhat after the fact, in efforts preventing or/and improving safety concerns and awareness. The result of this method is a huge database that is used for other business. In effect, this does not appear to be a proactive approach in addressing Service Difficulties. In addition, the additional requirements to the Service Difficulties Reporting: Final rule will generate additional submittals, far beyond the numbers currently reported, increasing additional load to an already perceived inefficient system.

On the other hand, in addition to submitting required SDRs to FAA, operators submit similar reports to internal engineering groups, and aircraft and engine manufactures. This is done as part of a discrepancy management process, in a manner that provides real time resolution to problems. In turn, manufacturers are prompt to alert fleet operators of potential problems. In addition, manufacturers submit to regulatory/certifying agencies, Service Difficulty Reports on their product as a mean of surveillance for continued airworthiness. Numerous manufacturer's Service Letters, Service Bulletins and Alerts are a direct result of this effort making this process the most efficient and effective way to communicate equipment and safety concerns. Full compliance of mandatory Service Bulletins is accomplished with the help of the FAA ACO.

In closing, I submit the following recommendations:

1. This SDR final rule be put on hold and
2. Rewritten to require operators to comply with industry's best practices and reporting processes. Elements of this practice should also be incorporated in this proposed new rule.
3. The additional items required in the proposed new rule should be reconsidered to ensure that the systems and specific items added are relevant and worthy of trend analysis.

Service Difficulty Report process is a very important part of maintaining the inherent reliability and safety designed into these products. FAA should capitalize on current industry efforts to enhance the reporting requirements to a level that brings added value and the benefits are realized and practiced by all participants.

Thank you for your consideration. Please don't hesitate to contact me at (202) 737-4479 if you either have any questions or require additional information.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'Elias Cotti', written in a cursive style.

Elias Cotti  
Senior Manager, Technical Operations

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